

Alan Cavallerano

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30:32 1 ALAN CAVALLERANO

14:30:34 2 A. I consider myself to be an
14:30:36 3 expert on the product from my readings
14:30:38 4 of the material and my general
14:30:43 5 understanding of the video field.

14:30:45 6 Q. And the first time you read
14:30:47 7 any detailed materials about the Paint
14:30:50 8 Box was February 2006?

14:30:52 9 A. That's correct. Sometime in
14:30:53 10 February.

14:30:57 11 Q. So you've been familiar
14:30:59 12 with the details regarding the Paint
14:31:02 13 Box for a little over three months?

14:31:03 14 A. That's correct.

14:31:05 15 Q. And it's your belief that
14:31:07 16 that makes you an expert on the Quantel
14:31:08 17 Paint Box?

14:31:09 18 MR. BEAMER: Objection;
14:31:20 19 asked and answered, argumentative.

14:31:22 20 A. Again, as I said, I feel
14:31:24 21 that I am an expert in the field of
14:31:26 22 video, and I have a lot of familiarity
14:31:28 23 working with different types of video
14:31:30 24 equipment. And the Paint Box would
25 fall into that category, so I would

31:32 1 ALAN CAVALLERANO

14:31:35 2 expect that I would feel comfortable

14:31:37 3 qualifying myself as such.

14:31:41 4 Q. Do you agree that

14:31:43 5 Mr. Taylor is an expert on the Quantel

14:31:44 6 Paint Box?

14:31:44 7 A. Yes.

14:31:45 8 MR. BEAMER: Objection;

14:31:48 9 calls for speculation.

14:31:50 10 Q. Sir, I want to ask you some

14:31:54 11 questions about the Paint Box system as

14:31:57 12 sold and demonstrated in March, April

14:32:00 13 '82, that's the subject of Mr. Taylor's

14:32:03 14 expert report. You are familiar with

14:32:03 15 that report?

14:32:04 16 A. Yes, I am.

14:32:09 17 Q. Would you agree that the

14:32:11 18 Paint Box could receive the video from

14:32:12 19 an external source?

14:32:13 20 A. Yes.

14:32:17 21 Q. Do you agree that the Paint

14:32:18 22 Box could receive video data

14:32:21 23 representing full size images?

14:32:22 24 A. Yes.

25 Q. Do you agree that the Paint

32:25 1

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14:32:28 2

Box had multiple frame stores?

14:32:32 3

A. Yes. I know that there were

14:32:34 4

multiple frame stores, yes, that's

14:32:34 5

correct.

14:32:36 6

Q. And those frame stores were

14:32:38 7

implemented with random access memory;

14:32:39 8

correct?

14:32:41 9

A. Yes, that would be typical

14:32:44 10

that a frame store would be implemented

14:32:45 11

that way.

14:32:46 12

Q. And do you agree that

14:32:48 13

either of those frame stores could

14:32:50 14

store a full size image?

14:32:52 15

A. Yes.

14:32:54 16

Q. Do you agree that the Paint

14:32:56 17

Box had at least one disk?

14:32:58 18

A. Yes, I'm aware of that.

14:33:00 19

Q. And the disk could store

14:33:01 20

video images?

14:33:03 21

A. Yes, I'm aware of that.

14:33:05 22

Q. It could store full size

14:33:07 23

video images?

14:33:09 24

A. Yes, it could store full

25

size images.

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34:31 1 ALAN CAVALLERANO

14:34:37 2 then reside as one composite image.

14:34:39 3 That much I am aware of, yeah.

14:34:41 4 Q. Let's put aside for a

14:34:42 5 moment what happens when you stick the

14:34:47 6 image down. We will get to that. Do

14:34:51 7 you agree that the Paint Box could

14:34:55 8 generate reduced size images?

14:34:56 9 MR. BEAMER: Asked and

14:34:56 10 answered.

14:34:59 11 A. Yes, as I stated, that's

14:34:59 12 correct.

14:35:01 13 Q. Do you agree that the Paint

14:35:03 14 Box could automatically generate

14:35:05 15 reduced size images?

14:35:06 16 MR. BEAMER: Objection;

14:35:07 17 vague.

14:35:11 18 A. Well, automatically, under

14:35:13 19 control of a user going through a

14:35:17 20 series of steps.

14:35:19 21 Q. Well, if the Paint Box

14:35:22 22 browse were used to browse full size

14:35:27 23 images stored on disk, didn't that

14:35:29 24 browse feature automatically generate

25 reduced size images?

ALAN CAVALLERANO

Quantel Paint Box, when it browsed full size images stored on disk, would automatically generate reduced size images; correct?

MR. BEAMER: Asked and answered.

A. Yes. And that in fact would be what a normal browse for a, let's say for a still store, that would be the normal mode of browsing. You would invoke the browse and then that would occur.

Q. So we both agree that the Paint Box could automatically generate reduced size images; correct?

MR. BEAMER: Asked and answered.

A. Yes. As I stated, it can reduce -- it can provide and generate reduced size images, taking images, full size images off the disk and putting them into the output frame store.

Q. And the Paint Box could

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generate a reduced size image that was
a small version of the full size image?

THE WITNESS: I'm sorry,
could you please read back the
question.

(Record read as requested.)

A. Well, as we've already
discussed for the browse screen, we
know that the full size image stored on
disk can go through the size reducer
and that that resulting reduced size
image then becomes a part of a browse
screen. And that that's a reduced size
image that the Paint Box is able to
create that way.

Q. Right. So we both agree
that the Paint Box could use its size
reducer to generate a reduced size
image; correct?

A. Yes, in the way that -- in
the way that I've described, yes.

Q. And that reduced size image
could be stored in either of the frame
stores; correct?

41:18 1 ALAN CAVALLERANO

14:41:20 2 MR. BEAMER: Objection.

14:41:29 3 A. That reduced sized image
14:41:31 4 most certainly could be stored in the
14:41:35 5 output frame store. And it's
14:41:38 6 temporarily present in the second frame
14:41:39 7 store.

14:41:43 8 Q. And that reduced size image
14:41:45 9 could be stored in the random access
14:41:47 10 memory of the Paint Box; correct?

14:41:49 11 A. Yes, that's correct, the
14:41:54 12 frame store is the random access
14:41:55 13 memory.

14:41:56 14 Q. And the reduced size image
14:41:58 15 could be stored in one frame store
14:42:01 16 while a full size image was in the
14:42:02 17 other frame store; correct?

14:42:03 18 MR. BEAMER: Objection;
14:42:16 19 vague.

14:42:19 20 A. When we say stored, it's
14:42:21 21 stored temporarily so that it can then
14:42:26 22 be stuck on to the output frame store.

14:42:28 23 Q. But regardless of whether
14:42:31 24 in your opinion it's temporary or not,
25 you agree that the Paint Box could

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14:44:02 1 ALAN CAVALLERANO

14:44:04 2 anything at all can be in two separate

14:44:07 3 frame stores, nothing is necessarily

14:44:12 4 precluding that. But it's a matter of

14:44:19 5 the entire operation and how that

14:44:23 6 reduced size image got there, that's of

14:44:25 7 significance to me with regard to my

14:44:27 8 analysis of that.

14:44:29 9 Q. But you agree, sir, do you

14:44:31 10 not, that the Paint Box could

14:44:35 11 simultaneously store one full size

14:44:37 12 image and one reduced size image in its

14:44:40 13 frame stores simultaneously; correct?

14:44:41 14 MR. BEAMER: Asked and

14:44:42 15 answered.

14:44:43 16 MR. SUMMERSGILL: Strike

14:44:46 17 that. Because I said simultaneously

14:44:48 18 twice. Let me try it again.

14:44:49 19 THE WITNESS: Okay.

14:44:50 20 Q. You agree, sir, do you not,

14:44:52 21 that the Paint Box could store a full

14:44:55 22 size image and a reduced size image in

14:44:57 23 its frame stores simultaneously;

14:44:58 24 correct?

25 MR. BEAMER: Asked and

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14:45:02 2 answered, vague.

14:45:06 3 A. As I've stated, through a

14:45:08 4 particular series of steps, it's

14:45:11 5 possible to have the reduced size image

14:45:14 6 temporarily in one frame store. And

14:45:18 7 the full size counterpart present in

14:45:22 8 the other, the display frame store.

14:45:23 9 Q. Now, do you agree that the

14:45:25 10 Paint Box could output images from disk

14:45:27 11 to its frame stores?

14:45:31 12 A. Yes.

14:45:34 13 Q. And it could output full

14:45:35 14 size images?

14:45:36 15 A. Yes, that's correct.

14:45:40 16 Q. And it could output images

14:45:43 17 from disk upon a user's command?

14:45:46 18 A. Yes, I believe that's

14:45:46 19 correct.

14:45:56 20 Q. Do you agree that the Paint

14:45:59 21 Box frame stores had input ports?

14:45:59 22 A. Yes.

14:46:01 23 Q. Do you agree that the Paint

14:46:04 24 Box frame stores had separate output

25. ports?

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56:39 1 ALAN CAVALLERANO

14:56:48 2 we know that -- I'm sorry, we were
14:56:50 3 talking about going from the disk to
14:56:52 4 the random access memory?

14:56:53 5 Q. I was asking you about the
14:56:56 6 transfer from size reducer to random
14:57:02 7 access memory.

14:57:04 8 A. Yes, we know that, as in the
14:57:12 9 case of the figure 19 in the -- I just
14:57:14 10 want to make sure, I'm just looking at
14:57:20 11 the figure. Figure 18. We know that
14:57:23 12 we have a direct transfer from -- this
14:57:25 13 is in the '776 patent, of the size
14:57:29 14 reducer to the random access memory at
14:57:30 15 the frame store, yes, that's correct.

14:57:32 16 Q. So do you agree that the
14:57:34 17 Quantel Paint Box could transfer images
14:57:38 18 directly from the size reducer to the
14:57:39 19 random access memory?

14:57:40 20 A. Yes, that's correct.

14:57:41 21 Q. And do you agree that the
14:57:43 22 Paint Box could transfer images
14:57:48 23 directly from the disk to random access
14:57:49 24 memory?

25 MR. BEAMER: Read that back,

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1 00:17 1

ALAN CAVALLERANO

15:00:18 2

that the Paint Box filter card

15:00:21 3

contained random access memory?

15:00:21 4

MR. BEAMER: Objection;

15:00:22 5

vague.

15:00:24 6

A. I believe it did. I would

15:00:27 7

need to look at the manual to be sure

15:00:31 8

that that's the type of memory that it

15:00:31 9

had.

15:00:35 10

Q. Was the transfer from disk

15:00:38 11

to the random access memory of the

15:00:41 12

filter card a direct transfer?

15:00:45 13

A. It's my understanding that

15:00:49 14

it would be.

15:00:53 15

Q. Now, the Paint Box frame

15:00:57 16

store could also output video images

15:00:59 17

for display on the Paint Box frame

15:01:00 18

store; correct?

15:01:01 19

A. Yes, that's right.

15:01:04 20

Q. The Paint Box with the use

15:01:08 21

of its combiner, could access a reduced

15:01:10 22

size image stored at one frame store

15:01:13 23

and a full size image stored at another

15:01:21 24

frame store simultaneously; correct?

25

THE WITNESS: I'm sorry,

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07:40 1

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15:07:44 2

access one reduced size image and one

15:07:46 3

full size image simultaneously;

15:07:54 4

correct?

15:07:56 5

A. Yes, as I would expect.

15:07:57 6

Q. And you agree --

15:07:58 7

MR. BEAMER: Are you done

15:07:59 8

with your answer?

15:08:00 9

A. As I would expect for

15:08:03 10

products of this nature, it most

15:08:05 11

certainly would be possible to have,

15:08:08 12

and I would expect, some type of a

15:08:10 13

combiner circuit that would perform

15:08:12 14

that type of an operation.

15:08:15 15

Q. So that was well known in

15:08:15 16

the art?

15:08:17 17

A. Yes, that was well known in

15:08:17 18

the art.

15:08:19 19

Q. Now, you agree that the

15:08:21 20

Paint Box had a browse feature.

15:08:24 21

A. Yes, I'm familiar with that.

15:08:25 22

Q. And you agree that the

15:08:27 23

Paint Box could store multiple reduced

15:08:31 24

size images in random access memory?

25

MR. BEAMER: Read that back,

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15:08:42 2 please.

15:08:42 3 (Record read as requested.)

15:08:44 4 A. Yes, as we went over a
15:08:46 5 little while earlier, it was possible
15:08:49 6 to pull up full size images from the
15:08:52 7 disk, have them go through the filter
15:08:55 8 card and size reducer, and have those
15:08:59 9 reduced sized images reside in an
15:09:02 10 appropriate spot in the random access
15:09:08 11 memory, to create a browse screen.

15:09:10 12 Q. So you agree that Paint Box
15:09:12 13 could store multiple reduced size
15:09:14 14 images in random access memory;
15:09:15 15 correct?

15:09:15 16 A. Yes, that's correct.

15:09:16 17 Q. And do you also agree that
15:09:20 18 the Paint Box could display a mosaic of
15:09:31 19 reduced size images?

15:09:33 20 A. The -- well, I would call
15:09:35 21 that, what I was just describing right
15:09:38 22 now, this array of reduced size images
15:09:40 23 for the browse, that would be to one
15:09:42 24 skilled in the art, one would call that
25 a mosaic. So yes.

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09:35 1
16:09:36 2 Q. Sir, before the break you
16:09:38 3 were describing the process by which an
16:09:41 4 operator using the Paint Box could put
16:09:45 5 a rectangle around the reduced size
16:09:47 6 image in the frame store and save only
16:09:51 7 the pixels corresponding to that image
16:09:53 8 to disk; is that correct?

16:09:59 9 A. I was referring to using the
16:10:02 10 rectangle function to select those
16:10:08 11 pixels which were from the -- which
16:10:11 12 were from the full size image which was
16:10:13 13 reduced and stuck on to the full size
16:10:16 14 image to create a new composite full
16:10:18 15 size image and using the rectangle
16:10:19 16 function for that operation, yes.

16:10:21 17 Q. When the operator places
16:10:26 18 the rectangle over the pixels that
16:10:31 19 represent the reduced size image, or
16:10:33 20 what you call part of the full size
16:10:35 21 image, only the pixels within that
16:10:38 22 rectangle are saved to disk; correct?

16:10:40 23 MR. BEAMER: Objection.

16:10:44 24 A. That's my understanding.

25 Q. So assuming that you

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00:18 1

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17:00:20 2

Q. And the Paint Box could

17:00:25 3

reduce the size of those cutouts;

17:00:25 4

correct?

17:00:25 5

A. That's correct.

17:00:27 6

Q. And the Paint Box could

17:00:31 7

store those reduced size cutouts to

17:00:31 8

disk; correct?

17:00:34 9

MR. BEAMER: Objection.

17:00:37 10

A. The Paint Box could store

17:00:41 11

cutouts to disk.

17:00:42 12

Q. And the Paint Box could

17:00:45 13

then browse cutouts that were stored on

17:00:46 14

disk; correct?

17:00:47 15

A. Yes, that's correct.

17:00:49 16

Q. And it could browse reduced

17:00:52 17

size cutouts that were stored on disk;

17:00:53 18

correct?

17:00:54 19

A. Yes, that's my

17:01:01 20

understanding.

17:01:03 21

Well, when we say reduced

17:01:08 22

sized cutouts, though, what we're

17:01:14 23

talking about are cutouts. They are

17:01:16 24

still cutouts.

25

Q. Well, cutouts can be

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01:17 1 ALAN CAVALLERANO

17:01:19 2 reduced in size; correct?

17:01:20 3 A. Yes, it's my understanding
17:01:22 4 that you would be able to pull up a
17:01:26 5 cutout and manipulate it, for example,
17:01:28 6 reducing it in size.

17:01:33 7 Q. And after you reduce it in
17:01:36 8 size, you can store that cutout to disk
17:01:38 9 on the Paint Box; correct?

17:01:40 10 A. That's my understanding,
17:01:40 11 yes.

17:01:43 12 Q. And then using the Paint
17:01:45 13 Box browse function, you can browse
17:01:47 14 through cutouts that are stored on
17:01:48 15 disk; correct?

17:01:50 16 A. Yes, that's correct.

17:01:53 17 Q. And that's set forth in the
17:01:59 18 Paint Box manual guide; correct?
17:01:59 19 Strike that.

17:02:00 20 That's set forth in the
17:02:02 21 Paint Box user guide; correct?

17:02:04 22 A. Yes, I have reviewed that
17:02:07 23 document, I believe that -- I know that
17:02:15 24 that is correct, yes.

25 Q. And as far as you know, the

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12:05 1 ALAN CAVALLERANO

17:12:09 2 pulling off the amount of data for
17:12:11 3 these individual pieces.

17:12:14 4 Q. So one of the reasons the
17:12:20 5 Paint Box browse cutouts is faster than
17:12:22 6 the Paint Box browse of full size
17:12:24 7 images, is because the cutouts contain
17:12:27 8 less data than the full size images;
17:12:34 9 correct?

17:12:35 10 A. Yes. Because again, what
17:12:37 11 bogs down the system is needing to pull
17:12:39 12 off the full size image. And in fact
17:12:43 13 that's what is such a benefit of the
17:12:45 14 '121 system, where you don't need to be
17:12:47 15 able -- where you don't need to pull
17:12:50 16 off the full size image and send it
17:12:59 17 through the size reducer each time.

17:13:02 18 Q. Now, you agree that the
17:13:05 19 demonstration that Mr. Taylor showed on
17:13:08 20 his videotape could actually be done on
17:13:10 21 the Quantel Paint Box; correct?

17:13:13 22 A. I have no reason to think
17:13:17 23 that an operator couldn't set up the
17:13:23 24 steps to be able to create that -- to
25 be able to create that effect.

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Q. Now, when the Paint Box
browses full size images, the operator
can then select one of the resulting
reduced size images in the browse in
order to obtain the full size image;
correct?

A. We are talking about for the
Paint Box?

Q. Yes.

A. Yes, that's correct.

Q. So in the Paint Box, when
an operator selects a reduced size
image in the browse in order to obtain
a full size image corresponding to that
reduced size image, is there a working
relationship between the browsed image
and its corresponding full sized image?

A. For that moment in time,
yes. Because the full size image went
through -- went through the size
reducer and a browse screen was
created. And then there would be a way
to go from the reduced sized image
that's in the browse screen to, back to

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the full sized image. And of course that's really what the prior art systems all allowed you to do that, otherwise the notion of browsing really wouldn't -- it wouldn't work, because then you wouldn't be -- you wouldn't be browsing.

Q. Now, sir, we talked earlier about the embodiment of, Mr. Beaulier's embodiment of the '121 system, which was the ESS-3 system. Do you recall that?

A. I'm not sure when we discussed that. Sorry.

Q. Fair enough. We may not have used the term ESS-3.

The system designed by Mr. Beaulier, in your expert opinion, maintained a relationship between full and reduced size images by assigning a number to the reduced size image that correlated with the number assigned to the full size image; correct?

A. In a particular example, one

59:47 1 ALAN CAVALLERANO

2 intervention from the CPU."

17:59:51 3 Do you see that?

17:59:51 4 A. Yes, I do.

17:59:54 5 Q. And Mr. Sheikh is

17:59:58 6 indicating that the AVA was capable of

18:00:01 7 transferring image data directly

18:00:05 8 between frame store and disk; correct?

18:00:07 9 A. Yes, that's correct.

18:00:10 10 Q. And the advantage of doing

18:00:13 11 that, according to Mr. Sheikh, is that

18:00:17 12 it facilitates fast picture storage and

18:00:18 13 recall; correct?

18:00:20 14 A. Yes, that's correct.

18:00:21 15 Q. And is it your

18:00:25 16 understanding that the AVA system was

18:00:29 17 capable of transferring image data

18:00:34 18 directly from disk to the frame store,

18:00:36 19 as Mr. Sheikh describes here?

18:00:41 20 A. Yes, that's correct.

18:00:54 21 Q. Now, sir, turning back to

18:01:00 22 your expert report. Specifically

18:01:10 23 please turn to paragraph 190.

18:01:12 24 Do you have that, sir?

25 A. Yes, I do.

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Q. Paragraph 190 discusses the potential of combining the AVA system with an electronic still store system; correct?

A. Yes, that's correct.

Q. In your expert opinion, was it common in the 1982 time period to use graphics systems, such as the AVA, in conjunction with electronic still store systems?

A. I would say that that's most certainly within the realm of possibility, to be utilizing systems that way, combining systems.

Q. That was well known as of 1982; correct?

A. Yes, that's correct.

Q. Sir, do you agree that the Ampex AVA system could generate reduced size images?

A. Yes.

Q. And the AVA could display reduced size images in its frame store; correct?

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02:59 1

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18:03:01 2

A. Yes, that's correct. In a

18:03:04 3

similar way as we were discussing for

18:03:08 4

the Paint Box, it was possible to pull

18:03:14 5

up images from the disk, use the

18:03:20 6

computer to perform the size reduction,

18:03:24 7

filtering and size reduction, and then

18:03:27 8

reduce the image and present it for

18:03:29 9

display.

18:03:31 10

Q. And it could be displayed

18:03:34 11

in the AVA frame store; correct?

18:03:38 12

A. Yes, that's correct. And

18:03:42 13

again, this is a case of an image

18:03:46 14

that's been reduced in size and then

18:03:51 15

inserted into a full size image so as

18:03:56 16

to be a composite image, what I've been

18:03:57 17

calling a composite image.

18:03:59 18

Q. In paragraph 166 of your

18:04:01 19

expert report, you indicate that the

18:04:04 20

AVA only had a single frame store that

18:04:07 21

could hold only a single full size

22

image.

18:04:09 23

Do you see that?

18:04:10 24

A. Yes, that's correct.

25

Q. You agree, do you not, that

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ALAN CAVALLERANO
C E R T I F I C A T E
STATE OF NEW YORK)
: ss.
COUNTY OF NEW YORK)

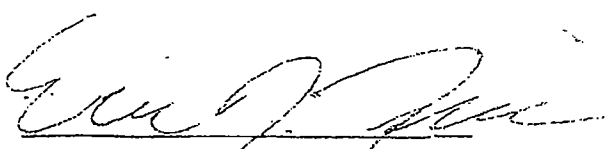
I, ERIC J. FINZ, a Shorthand
Reporter and Notary Public within and
for the State of New York, do hereby
certify:

That ALAN CAVALLERANO, the witness
whose deposition is hereinbefore set
forth, was duly sworn by me and that
such deposition is a true record of the
testimony given by the witness.

I further certify that I am not
related to any of the parties to this
action by blood or marriage, and that I
am in no way interested in the outcome
of this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 8 day of
May, 2006.

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CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2006, I electronically filed Redacted Appendix to Defendants' Answering Brief in Opposition to Plaintiff Ampex's Motion for Summary Judgment that U.S. Patent No. 4,821,121 is Not Unenforceable Due to Inequitable Conduct to with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

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and that I caused copies to be served upon the following in the manner indicated:

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